

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

STEPHEN MANKUS	:	
	:	
	:	
v.	:	No. 02-3425
	:	
	:	
SWAN REEFER I, A.S.	:	

REQUESTS FOR VOIR DIRE

PLEASE TAKE NOTICE THAT THE UNDERSIGNED ATTORNEY FOR THE
PLAINTIFF REQUESTS THE FOLLOWING INQUIRIES OF THE JURY PANEL.

RESPECTFULLY,

E. ALFRED SMITH & ASSOCIATES

E. Alfred Smith
Attorney for Plaintiff

I. **GENERAL BACKGROUND**

1. What is your name, address and age?
2. Are you employed? If so, what type of work do you do?
3. What is your marital status?
4. Does your spouse work outside the home? If so, what type of work does he or she do?
5. How far have you gone in school?
6. Are you or any immediate members of your family working in any of the following fields?
 - a. Longshoring?
 - b. Safety?
 - c. Medicine?
 - d. Law?
7. Do you have any children? If so, what are their ages and occupations?

II. **JUROR INTERESTS**

1. What is your favorite hobby?
2. What radio station do you listen to most often?
3. What newspapers do you read?
4. Do you have a bumper sticker, window decal or a personalized license plate on your car? If so, what do they say?
5. Have you ever served in the military? If so, what was your specialty?
6. Are you currently or have you ever been a member of a union? If so, which union?
7. Do you participate in any community activities/ organizations?

III. **MARITIME CONNECTIONS**

1. Do any of you work in a job related to the Philadelphia

or Camden waterfront?

2. If so, what is your job?
3. Do any of you have any friends or relatives who work at a job related to the Philadelphia waterfront?
4. If so, what is their job?
5. Have any of you ever taken a cruise?
6. Were you injured during that cruise? If so, tell us about it.
7. Do any of you have a maritime background from education, employment or whatever? If so, tell us about it.

IV. **POTENTIAL JUROR BIAS**

1. Have you or your spouse ever served as a juror in a civil case? If so, what type of case was it and what was the verdict?
2. Have you ever been a plaintiff or defendant in a lawsuit involving injuries? If so, tell us about it.
3. Without knowing anything at all about this case other than what I have told you up to now, is there any reason why you feel that it would be inappropriate for you to serve as a juror on this case or prevent you from being fair and impartial?
4. Are you or any member of your immediate family employed or have been employed in the past with the insurance business, either as an employee, agent, adjuster, representative of insurance companies or claims agencies?
5. Have you or any of member of your immediate family ever been represented by either party's counsel or member of their firm?
6. Are you or any member of your immediate family personal acquaintances of any of the parties or witnesses herein, their counsel or counsel's partners or associates?
7. Is there any question that we have not asked you or is there any piece of information that you feel would be

important to share with us that would enable us to understand you better and to be better able to assess your ability or your desire to serve as a member of this jury panel?

V. **POTENTIAL ANTI-LAWSUIT SENTIMENT**

1. Do any of you have a feeling about bringing lawsuits involving claim for personal injuries which would affect your ability to be fair and impartial?
2. Do you of any dislike the manner in which our civil justice system compensates victims? If so, will you be able to follow my instructions and decide this case on those instructions and the evidence presented?
3. If the plaintiff proves that he is entitled to money damages for pain, suffering, disability and the loss of enjoyment of life, will you be able to fully and fairly consider those damages? Or , do you feel people should just be compensated for their medical bills and wage loss and should not be compensated for pain and suffering?
4. Our law allows person who are injured due to the negligence of others to seek money from a jury. Do you believe it is either wrong or inappropriate for a person to bring such a lawsuit?
5. Is there anyone here who by reason of morals, religion or philosophy believes it is improper to bring a lawsuit for pain and suffering and disability and impairment?
6. Is there anyone here who feels there should be an upper or lower limit set for the amount of money someone found to be negligent should be required to pay?

VI. **INJURIES**

1. Have any of you ever been injured in an auto crash? Please describe.
2. Have any of any members of your immediate family died from a car or truck crash? Was a lawsuit brought?

VII. **WITNESSES**

1. The parties to this case are Stephen Mankus, who lives in Brigantine, N.J. and Swan Reefer A/S, a Norweigan corporation.
2. Plaintiff's witnesses are: (To be supplied).
3. Defendant's witnesses are : (To be supplied).
4. Do any of you know any of these paries or people? If so, please tell us about it.

VIII. **GENERAL**

Is there any reason why any of you would not be able to render a very substantial verdict in favor of the plaintiff if the evidence warrants it?